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Amoco Oil Company
200 East Randolph Drive
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Chicago, Illinois 60680

April 19, 1984

Certified Mail P454-431-129
Return Receipt Requested

Mr. Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Local Pollution Control
Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Mr. Eastep:

Amoco Waste Water Treating Plant—Main Office Site; ILD 006272629

Please refer to your March 23, 1984 request for supplemental information pertaining to closure of Amoco's Waste Water Plant—Main Office Site (ILD 006272629) in Wood River, as described in our February 25, 1984 letter.

The items of equipment involved in hazardous waste management, as stated in your letter are:

Tank T-202 DAF float storage
Tank T-1001 belt filter feed tank
Two Bellmer Winkelpresse belt filters
Two roll-off trailer boxes
The storage area for the trailer boxes
Spills and leaks

The items enumerated in your letter are addressed in the following paragraphs:

1) 725.212(a)(2): During the life of the facility, Tank T-202 could have contained as much as 38,000 gallons of DAF float. Tank T-1001 was typically limited to a volume of 15,000 gallons of waste. The belt presses were for treating (dewatering) and contained no inventory. The roll-off trailer boxes were limited because of weight restrictions, to 15 cubic yards each. It is possible that during the life of the facility, a maximum of 30 cubic yards of dewatered solids could have been in inventory at one time.

2) 725.212(a)(3), 725.214, 725.297: We estimate that 5 to 10 million gallons of nonhazardous DAF float have passed through this system since November 1981 when the dewatered solids were classified nonhazardous. Lines and pumps have to be considered decontaminated because of the length of time that the inside surfaces were subjected to the turbulent,

scouring action of this volume of fluid. This conclusion is borne out by periodic tests on dewatered solids that continue to show they are nonhazardous.

Decontamination of tanks will consist of first emptying the tanks as far as possible, and then sampling and testing the residues on the bottoms and sides of the tanks. If tests show the residues are nonhazardous, the tanks will be deemed to be decontaminated. If tests show that the residues are hazardous, all fluid material will be removed, solidified, and disposed of in a hazardous waste landfill. The inside surfaces will then be cleaned using detergent, brushes, and rags. All liquids resulting from the cleaning will be solidified, combined with other solids, and disposed of in a hazardous waste landfill.

Decontamination of the belt filters will consist of compositing scrapings of residues from the filter frames and supporting structure; the belts are automatically washed clean during the filtering operation. The scrapings will be tested, and, if found to be nonhazardous, the belt filter installation will be considered to be decontaminated. If the scrapings are shown to be hazardous by test, the filter frames and support structure will be cleaned using detergent, brushes, and rags, and the cleaning wastes will be disposed of in a hazardous waste landfill after solidifying any liquids.

Scrapings will be composited from the inside and outside of each roll-off trailer box, separately. Scrapings will also be taken from the surrounding floor area around each box. The four samples will be tested, and, if found to be nonhazardous, the boxes and surrounding areas will be deemed to be decontaminated. If any of the four samples are hazardous by test, the corresponding box or area will be cleaned with detergent, brushes, and rags, and the cleaning wastes disposed of in a hazardous waste landfill after solidifying any accumulated liquid.

The areas around the two storage tanks will be examined for evidence of spills, especially under the DAF float conveyor between the inlet clarifier and T-202. Scrapings will be taken from any spills on the concrete around T-1001 or the ground around T-202 and tested. If tests show the spilled material to be nonhazardous, no further action will be taken. If the scraping from the concrete is hazardous by test, the concrete will be cleaned using detergent, brushes, and rags, and the cleaning wastes disposed of in a hazardous waste landfill. If the soil scraping is hazardous by test, all obvious non-soil material will be excavated along with 1" to 2" of soil and disposed of as hazardous waste. A second scraping will be made of the exposed soil in the spill area and will be submitted for testing. If the sample is hazardous by this test, the process will be repeated, removing an additional 1" to 2" soil each time until a scraping is no longer hazardous by test. At this point, the excavation will be backfilled if deep; otherwise, the area will be levelled without backfilling.

3) 725.212(a)(4): Closure is planned in 1984. A schedule of closure activities is shown below:

Activity	Days After Approval of Closure Plan for Completion
Complete sampling	15
Complete testing	60
Resample and retest (if required)	120
Certification	180

4) 725.242(a): The estimated cost of closure is $8,500 which was calculated as shown below.

Travel expenses for sampling, including consultant	$1,060
Testing ten samples	1,400
Resampling, retesting 50 percent of samples	1,540
Disposal	1,500
Certification	3,000
Total	$8,500

We have not addressed the past disposal areas in the adjoining tank field in this closure plan because those sites, known and probable, were reported as Superfund sites in 1981 as required by CERCLA. We feel that the investigation, evaluation, and remedial action, if any, for those sites are separate issues that are not properly part of a RCRA closure plan. These sites were never regulated under RCRA because they were inactive when RCRA regulations became effective on November 19, 1980. We will be pleased to meet with you at your convenience to develop a program to evaluate these sites and to devise a remedial action plan if one is required.

It may be of value to know that, although Amoco has donated the main office building to a nonprofit Madison County organization and has donated the waste water treating plant to the city of Wood River, Amoco will retain ownership of the tank field where the past disposal sites are located. The city, incidentally, has not yet assumed operation of the waste water treating plant.

Please let us know if you require further information.

Yours truly,

J. G. Huddle
Director, Environmental Control and Planning
Mail Code 1203

JGH/cad